

# **Exhibit 11**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

CF 135 FLAT LLC, CF 135 WEST MEMBERS  
LLC, and THE CHETRIT GROUP, LLC,

Interpleader Plaintiffs,

- against -

TRIADOU SPV S.A. and CITY OF ALMATY, a  
foreign city,

Interpleader Defendants.

CITY OF ALMATY, KAZAKHSTAN and BTA  
BANK JSC,

Crossclaim Plaintiffs,

- against -

MUKHTAR ABLYAZOV, VIKTOR  
KHRAPUNOV, ILYAS KHRAPUNOV, and  
TRIADOU SPV S.A.,

Crossclaim Defendants.

ECF Case

No. 15 CV 05345 (AJN)

**TRIADOU SPV S.A.’S RULE 26 INITIAL DISCLOSURES**

Crossclaim Defendant Triadou SPV S.A. (“Triadou”), by and through its undersigned counsel, submits its Initial Disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1)(A) and this Court’s Civil Case Management Plan and Scheduling Order, dated July 29, 2016 (ECF No. 205), to Crossclaim Plaintiffs City of Almaty (“Almaty”) and BTA Bank JSC (“BTA”) (together, “Almaty/BTA”), and to Crossclaim Defendants Mukhtar Ablyazov, Viktor Khrapunov, and Ilyas Khrapunov. Triadou reserves the right to amend or supplement these disclosures to the extent it becomes aware of additional information or documents during the course of discovery.

By serving these disclosures, Triadou does not admit or acknowledge that the information or documents identified herein constitute admissible evidence, are relevant to this action, or may lead to the discovery of admissible evidence. Triadou specifically reserves the right to oppose discovery of any information or documents identified herein to the extent the discovery (i) is not relevant to any party's claim or defense, (ii) is not proportional to the needs of the case, or (iii) seeks information protected from discovery or disclosure by some applicable privilege or immunity, including the attorney-client privilege, attorney work product doctrine, and/or any other rule or privilege, immunity or confidentiality protected by law.

**I. FED. R. CIV. P. 26(a)(1)(A)(i) – INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION**

The following individuals are likely to have knowledge of the facts relating to the parties' claims and defenses in this action, with the exception of those who may be called at trial solely for the purposes of impeachment.

<b>Name</b>	<b>Address</b>	<b>Nature of Information</b>
Madina Ablyazova	Unknown	Information regarding Mukhtar Ablyazov and Ilyas Khrapunov
Mukhtar Ablyazov	c/o Kobre & Kim LLP Jonathan D. Cogan 800 Third Avenue New York, NY 10022	Information regarding allegations in the Crossclaims
Nicolas Bourg	Belgium	Information regarding Triadou and its investments, business with the Chetrit Entities, and Bourg's misconduct
Cesare Cerrito	c/o Blank Rome LLP The Chrysler Building 405 Lexington Avenue New York, NY 10174	Information regarding Triadou's operations and finances, SDG's operations and finances, and the sale of SDG

<b>Name</b>	<b>Address</b>	<b>Nature of Information</b>
Joseph Chetrit	512 7 <sup>th</sup> Avenue New York, NY 10018	Information regarding New York real estate investments including Flatotel and Cabrini Medical Center, the assignment and disposition of those investments, and investment in Bourg's endeavors
Meyer Chetrit	Unknown	Information regarding New York real estate investments including Flatotel and Cabrini Medical Center
Agnes Cossu (Chabrier Avocats)	c/o Blank Rome LLP The Chrysler Building 405 Lexington Avenue New York, NY 10174	Information regarding SDG Board meetings
Erik Elkain (Associate of J. Chetrit)	Unknown	Information regarding New York real estate investments including Flatotel and Cabrini Medical Center
Laurent Foucher (Partner of N. Bourg)	Unknown	Information regarding Triadou's operations and investments, and Bourg's conduct
Jean-François Garneau (Former CEO of SDG)	c/o Blank Rome LLP The Chrysler Building 405 Lexington Avenue New York, NY 10174	Information regarding Triadou's operations and finances, SDG's operations and finances, and the purchase of SDG
David Gaymard (Former SDG Manager)	c/o Blank Rome LLP The Chrysler Building 405 Lexington Avenue New York, NY 10174	Information regarding Triadou's operations and finances, SDG's operations and finances, and the purchase of SDG
Marc Gillieron (SDG Board Member)	c/o Blank Rome LLP The Chrysler Building 405 Lexington Avenue New York, NY 10174	Information regarding Triadou's operations and finances, SDG's operations and finances, and the purchase of SDG
Philippe Glatz	c/o Blank Rome LLP The Chrysler Building 405 Lexington Avenue New York, NY 10174	Information regarding Triadou's operations and finances, SDG's operations and finances, and the purchase of SDG

<b>Name</b>	<b>Address</b>	<b>Nature of Information</b>
Jehoshua Graff	Sukenik, Segal & Graff, P.C. 450 7th Avenue 42nd Floor New York, NY 10123	Information regarding New York real estate investments including Flatotel and Cabrini Medical Center
Bernard Katz (Former SDG Board Member)	c/o Blank Rome LLP The Chrysler Building 405 Lexington Avenue New York, NY 10174	Information regarding Triadou's operations and finances, SDG's operations and finances, and the purchase of SDG
Ilyas Khrapunov	c/o Hoguet Newman Regal & Kennedy LLP John J. Kenney 10 East 40th Street New York, NY 10016	Information regarding allegations in the Crossclaims
Leila Khrapunova	Unknown	Information regarding Viktor Khrapunov
Viktor Khrapunov	c/o Hoguet Newman Regal & Kennedy LLP John J. Kenney 10 East 40th Street New York, NY 10016	Information regarding allegations in the Crossclaims
Matthew Meltsner	135 West 52 <sup>nd</sup> Street Owner, LLC 512 7 <sup>th</sup> Avenue New York, NY 10018	Information regarding New York real estate investments including Flatotel
Kevin Meyer (Former associate of N. Bourg)	Unknown	Information regarding Triadou's operations and investments, and Bourg's conduct
Gennady Petelin	House 6, Apt. 43 Volzhskiy Blvd. Moscow, Russian Federation	Information regarding Telford Trust, Telford International Limited, and the sources of Telford's funding
Elena Petelina	House 6, Apt. 43 Volzhskiy Blvd. Moscow, Russian Federation	Information regarding Telford Trust, Telford International Limited, and the sources of Telford's funding

Name	Address	Nature of Information
Mamadrafik Rosanaly	Lot II B57 Mahalavolona, Antananarivo, Madagascar	Information regarding Telford Trust

**II. FED. R. CIV. P. 26(a)(1)(A)(ii) – CATEGORIES AND LOCATIONS OF RELEVANT DOCUMENTS**

The following list identifies the categories of documents and electronically stored information in Triadou’s possession, custody, or control, that it may use to support its claims and defenses in this action, with the exception of those that may be used solely for the purpose of impeachment at trial. As noted below, upon information and belief, some of these materials are already in Almaty/BTA’s and/or the other Crossclaim Defendants’ possession, custody, or control and/or more readily accessible through other entities not party to this litigation.

Category	Location
Documents regarding Triadou’s operations, investments, funding, and finances	Geneva, Switzerland
Documents regarding Triadou’s formation	Luxembourg
Documents regarding the purchase/sale of SDG	Geneva, Switzerland
Documents regarding Triadou’s U.S. investments and related communications with the Chetrit Entities	Geneva, Switzerland

**III. FED. R. CIV. P. 26(a)(1)(A)(iii) – COMPUTATION OF CATEGORIES OF DAMAGES**

Triadou does not anticipate seeking damages (except to the extent the attachment order is vacated), aside from any relief the Court deems just and appropriate under the circumstances, in an amount to be determined at trial. Triadou reserves the right to amend its damages computation as its investigation and discovery proceed.

**IV. FED. R. CIV. P. 26(a)(1)(A)(iv) – INSURANCE AGREEMENTS**

Triadou is unaware of any insurance agreement under which an insurance business may be liable to satisfy all or part of any judgment against Triadou in this action, or to indemnify or reimburse Triadou for payments made to satisfy any such judgment here.

Dated: New York, New York  
August 12, 2016

BLANK ROME LLP

By: s/Deborah A. Skakel  
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Triadou SPV S.A.*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 12th day of August, 2016, a true and correct copy of

**Triadou's Rule 26 Initial Disclosures**, was served by electronic mail on all of the following:

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s/ Deborah A. Skakel  
\_\_\_\_\_  
Deborah A. Skakel